



Pine Chemicals Association, Inc.

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Atlanta, Georgia 30338
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ARZ01-13665

March 19, 2002

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

Re: Correction to Pine Chemicals Association, Inc. Test Plan for
Rosin Adducts and Adduct Salts

Dear Ms. Whitman:

The Pine Chemicals Association, Inc. (PCA) HPV Task Force has recently reviewed the comments it received on its Test Plan for Rosin Adducts and Adduct Salts from the Physicians Committee for Responsible Medicine (PCRM). In doing so, we realized an error in our test plan related to our proposed testing for acute oral toxicity.

In our test plan, PCA mistakenly proposed to perform the OECD 401 method using fumarated rosin to meet the HPV SIDS endpoint for acute oral toxicity for the rosin adducts category. PCRM pointed out in its comments, however, that OECD 401 is the traditional LD50 test and suggested the use of alternative methods OECD 423 or 425.

PCA does not intend to conduct the traditional LD50. We intend to use OECD 425, known as "the up-down" procedure, which minimizes the use of rats in acute toxicity testing. Thus, we would like to amend our test plan to refer to OECD 425.

PCA will address all additional comments and any amendments to our Test Plan after we receive EPA's comments. We appreciate the opportunity to correct our Test Plan on this very important point and we wish to thank PCRM for pointing out our error.

MR-57404

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Sincerely,

Walter L. Jones
President & COO

cc: Nicole Cardello, PCRM
Jessica Sandler, PETA